

FILED

5/1/2020

SXB

UNITED STATES DISTRICT COURT

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**RECEIVED**

NOV 4 2019

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Jacquetta L. Carr

Plaintiff(s)
 (Write the full name of each plaintiff who is filing this complaint.
 If the names of all the plaintiffs cannot fit in the space above,
 please write "see attached" in the space and attach an additional
 page with the full list of names.)

-v-

CPS: William Hooks, Sheila Fowler, Cara Oshea,
 CTU Adrienne Cervantes, EEO Mary Ernesti of CPS

Defendant(s) ET AL
 (Write the full name of each defendant who is being sued. If the
 names of all the defendants cannot fit in the space above, please
 write "see attached" in the space and attach an additional page
 with the full list of names.)

for the
District of

Divis

1:19-cv-07275

) Judge Martha M. Pacold
) Magistrate Judge Gabriel A. Fuentes

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) Jury Trial: (check one) Yes No

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COMPLAINT FOR A CIVIL CASE**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address

Jacquetta L. Carr
 9935 S. Princeton
 Chicago
 Illinois
 779-210-7285
 jecareenterprises@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	William Hooks
Job or Title (<i>if known</i>)	Principal - Chicago High School of Agricultural Sciences
Street Address	
City and County	Chicago , Cook County
State and Zip Code	Illinois 60655
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	Sheila Fowler
Job or Title (<i>if known</i>)	Asst. Principal - Chicago high School of Agricultural Sciences
Street Address	
City and County	Chicago Cook County
State and Zip Code	Illinois 60655
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	Cara Oshea
Job or Title (<i>if known</i>)	Asst. Principal - Chicago High School of Agricultural Sciences
Street Address	
City and County	Chicago Cook County
State and Zip Code	Illinois 60655
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	Adrienne Cervantes
Job or Title (<i>if known</i>)	Chicago Teacher's Union
Street Address	
City and County	Chicago, Cook
State and Zip Code	Illinois
Telephone Number	

E-mail Address (*if known*)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Discrimination

· Title VII of the Civil Rights Act.

RELATED PRODUCTS

MORE

[The Employer's Legal Handbook](#)

[The Essential Guide to Family & Medical Leave](#)

[Your Rights in the Workplace](#)

Title VII of the Civil Rights Act of 1964 (42 U.S.C. 2000e and following) prohibits employers from discriminating against applicants and employees on the basis of race, color, religion, sex, and national origin (including membership in a Native American tribe). It also prohibits employers from retaliating against an applicant or employee who asserts his or her rights under the law. To learn more about retaliation, see our article on preventing retaliation claims by employees.

Title VII prohibits discrimination in all terms, conditions, and privileges of employment, including hiring, firing, compensation, benefits, job assignments, promotions, and discipline. Title VII also prohibits practices that seem neutral but have a disproportionate impact on a protected group of people. Such a practice is legal only if the employer has a valid reason for using it. For example, a strength requirement might be legal—even though it excludes disproportionate numbers of women—if an employer is using it to fill a job that requires heavy lifting. Such a requirement would not be valid for a desk job, however.

Title VII makes it illegal to harass someone on the basis of a protected characteristic (race, sex, and so on). For information on sexual harassment and tips on preventing it, see our article on preventing sexual harassment in the workplace.

Title VII applies to employers that fit into the following categories:

- private employers with at least 15 employees
- state governments and their political subdivisions and agencies
- the federal government
- employment agencies
- labor organizations, and
- joint labor-management committees and other training programs.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Jacquette L. Carr, is a citizen of the
State of (name) Illinois.

b. If the plaintiff is a corporation

The plaintiff, (name) NA, is incorporated
under the laws of the State of (name) NA,
and has its principal place of business in the State of (name)

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) William Hooks, is a citizen of the State of (name) Illinois. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Sheila Fowler, is incorporated under the laws of the State of (name) Illinois, and has its principal place of business in the State of (name) Illinois. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Defendants engaged in discrimination based on age, race and freedom of speech as allowed by CPS textbook resources. Defendants encouraged and solicited documents to be used to force resignation of plaintiff. Defendant targeted plaintiff based on age and race for termination prior to start of school year and at beginning of school year by creating scenarios and documents necessary to support such termination. Defendant attacked Plaintiffs educational methodology and threatened plaintiff through harassment and in writing regarding teaching a lesson within the context of subject matter contained in CPS authorized textbooks. Defendants created an unbarable working environment while plaintiffs spouse was ill to force resignation and failed to disclose their intents to terminate or to warn plaintiff of actions to terminate. Defendants did not provide proper guidance, resources, materials or warnings concerning the job responsibilities as music teacher so justify measures to terminate. Defendants did not provide proper due process, warnings, remediation, training and support for required job duties and responsibilities to cause Plaintiff to resign by Constructive Discharge.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff was subjected to the loss of over 75,000 dollars which include lost wages, reputation, emotional and mental duress and future employment opportunities.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

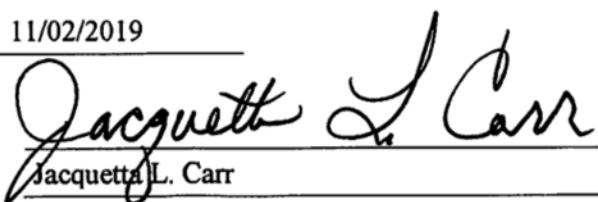
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/02/2019

Signature of Plaintiff

Printed Name of Plaintiff



Item A

Spouse: Michael L. Snoddy

Income:

Though spouse had income. This income was impacted by multiple illnesses, hospital trips, and stays, surgery and costly prescriptions costs. The forcing of loss of job placed my entire household in financial duress. Temporary – Short term employment opportunities were the only form of work I could obtain which provided meager financial support during a tumultuous time. I was faced with residency issues which impacted income because my spouse and family member who was providing residency help was sick and passed at the same time that Defendants forced me out of my job.